

Organic Sacramento

Care of Sacred Journey Ministry
3104 O Street #283
Sacramento, California 95816

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Esther Barajas-Ochoa
Regulations Coordinator
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-12B
1001 I Street
Sacramento, CA 95812

Dear Ms. Barajas-Ochoa:

On behalf of Organic Sacramento, I appreciate the opportunity to offer input on the proposed No Significant Risk Level (NSRL) under consideration for the Proposition 65 Glyphosate listing.

OEHHA's recent listing of Glyphosate as a probable carcinogen under Proposition 65 was a crucial first step in alerting the public as to the potential health risks Glyphosate poses. Establishing a meaningful NSRL, which aligns with OEHHA's Mission "... to protect and enhance public health and the environment by scientific evaluation of risks posed by hazardous substances," may be more problematic.

The many unique factors involved in the use of glyphosate, such as the varied nature of its applications, in addition to its pervasive use worldwide, creates obstacles in obtaining a meaningful NSRL. Glyphosate's ubiquitous presence in the world's soils, water, and food, along with the unique circumstances of the role Glyphosate plays in many aspects of agriculture, home and garden use, and the commercial food industry, make it questionable whether human exposure to Glyphosate can ever be accurately assessed.

Due to the overarching prevalence of Glyphosate and vast opportunities for human exposure, we request that you consider all of the below factors regarding Glyphosate exposure before finalizing OEHHA's Glyphosate NSRL.

Uncertainties in Glyphosate Exposure Include the Following:

1. Differences in those individuals who will be exposed.

Individuals with lower income and who live in disadvantaged communities will be receiving more glyphosate in their food as they do not have access to organic foods or they cannot afford them.

2. Occupational groups will be impacted differently.

Food and produce handlers are exposed to more glyphosate than those in other occupations, and therefore are more at risk of suffering the harmful effects of excessive exposure to Glyphosate.

3. Health effects in children are more damaging than in adults.

The more vulnerable populations, such as our children, the elderly, and the medically impaired, are also more at risk for harm from cumulative Glyphosate exposure. Please see the February 17, 2016 Study "*Concerns over use of glyphosate-based herbicides and risks associated with exposures: a consensus statement*" <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4756530/>.

4. Regardless of limits, some companies will not comply.

San Francisco resident Danielle Cooper filed a lawsuit in May 2016 seeking class action status against the Quaker Oats Co. after glyphosate residues were found in that company's oat products, which are used by millions of consumers as cereal and for baking cookies and other treats. Cooper said she expected the oat products, which have been labeled as "100% Natural," to be pesticide free.

5. It is impossible for individuals to know to what level of glyphosate they have been exposed to regardless of the establishment of safe exposure limits.

For example, $A+B=$ the safe exposure limit, but a person cannot know the amount of A or B so how can they know if the safe exposure limit has been reached? In today's world, where food is transported across national boundaries and between continents, food testing for glyphosate will never be able to keep up with food production and transportation. The only way to protect the consumer is to ban glyphosate outright, or at a minimum, to label food products that they may contain chemicals on the Proposition 65 List and they "may contain glyphosate, a probable carcinogen and endocrine disrupter." Please see the Food Democracy Now! and The Detox Project's "*Glyphosate: Unsafe on Any Plate*" Report.

Since, as listed above, there are so many factors and variables in Glyphosate exposure, we would therefore request that OEHHA staff consider re-evaluating the method by which they obtain the NSRL, so that their determination of the NSRL level takes into account the unique characteristics and role that Glyphosate plays in toxic chemical exposure from the many different sources.

And, we would like to suggest that it is also highly possible, if not likely, that there is no way to effectively establish a safe level, in which case we recommend that OEHHA consider establishing that **all** products which contain **any** level of Glyphosate should contain the Proposition 65 warning.

Thank you for considering the presented submissions and recommendations.

Sincerely,



Kim Glazzard
Director, Organic Sacramento

Attachments